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Superfund Records Center

ARAPAHOE CHEMICALS, INC.

A SYNTEX COMPANY

SITE: PicilloBREAK: 119

OTHER: _____

2075 N. 55TH ST. BOULDER, COLORADO 80301

TELEPHONE (303) 442-1926

TELEX NO. 4-5794

RECEIVED

August 26, 1982

SEP 7 1982

Office of Regional Counsel
U.S. Environmental Protection Agency
Region I
John F. Kennedy Federal Building, Room 2103
Boston, Massachusetts 02203

REGION I
OFFICE OF REGIONAL COUNSEL

Attention: Mr. Joel Blumstein

Dear Mr. Blumstein:

This letter is in response to your request dated July 22, 1982, which was received on July 26, 1982, regarding disposal at the Picillo waste disposal site in Coventry, Rhode Island. Arapahoe Chemicals, Inc. ("Arapahoe") has performed an extensive search for documents falling within the scope of your request. We formed a task group which devoted considerable time and effort to the project, particularly given the short time frame in which you said you needed the documents. As you might imagine, the search was made especially difficult by the fact that some of the records you seek are more than six years old and many had long since been placed in inactive files or in storage. The task group also conducted extensive interviews and discussions with persons who, it was felt, might be able to provide relevant information. These persons included both past and present employees of Arapahoe. In short, a laborious search and investigation was conducted but we have discovered no documents falling within the scope of your request and all information gathered confirms that Arapahoe did not send any substances to the sites or companies in question.

In specific response to your questions we provide the following findings:

- 1) We have found no documents or information suggesting that, between January 1, 1976, and December 31, 1977, Arapahoe or any of its officers, employees, agents, servants or attorneys arranged for the disposal of any hazardous wastes or substances in the State of Rhode Island.
- 2) Does not apply.
- 3) We have found no documents or information suggesting that, between January 1, 1976, and December 31, 1977, Arapahoe used the services of the following companies or individuals to dispose, treat or recycle wastes:



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Scientific Chemical Processing, Inc.
Chemical Waste Removal, Inc. or Corp.
Drums Automation, Inc. or Corp.
C & B Barrel, Inc. or Corp.
Advanced Environmental Technology Corp.
Chemical Control Corp.
United Sanitation, Inc.
Sanitary Landfill, Inc.
A. Capuano Bros., Inc.
Jack, Anthony, or Daniel Capuano
Candy Box Farms Agricultural Marketing, Inc.
Cannon Engineering, Inc. or Corp.

4) Does not apply.

In the conversation you had recently with our Counsel, Kent Stormer, you indicated that Arapahoe may have been included in your survey due to the fact that some steel drums found at the Picillo site had Arapahoe's name or logo printed on them. In this regard, I would like to point out that Arapahoe has been in the business for over 35 years of selling fine chemicals, which are often shipped in just such steel drums. As you know, it is common practice for companies receiving such chemicals to recycle the drums when they are empty by refilling them with wastes which may then be sent to landfills such as Picillo.

That is apparently what actually happened in this instance, since, as discussed above, extensive document searches and interviews demonstrate that Arapahoe has sent no materials to the Picillo site, to other sites in Rhode Island, or to any of the other companies or individuals listed in your inquiry.

It should also be noted that Arapahoe's nearest plant, in Newport, Tennessee, is over 1000 miles from the Picillo site. There is no need for Arapahoe to send its hazardous wastes such extraordinary distances, across at least five state borders and at great cost, given the proximity to Newport of several closer hazardous waste sites.

If you have any further questions, please do not hesitate to call me.

Sincerely yours,



Courtland K. Spicer, Ph.D.
Director, Quality Assurance,
Regulatory and Environmental Affairs

CKS:ss

cc: Mr. Robert H. Ellis II
Mr. Kent A. Stormer, Esq.